

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.,

Plaintiff,

v.

LM ERICSSON TELEPHONE COMPANY
(Telefonaktiebolaget LM Ericsson), QUALCOMM
INC., ALCATEL-LUCENT, U.S.A., INC., THIRD
GENERATION PARTNERSHIP PROJECT a/k/a
3GPP, and EUROPEAN TELECOMMUNICATIONS
STANDARDS INSTITUTE,

Defendants.

CIVIL ACTION
2:11-cv-04574-RFK

**SECOND SUPPLEMENTAL STATUS REPORT OF DEFENDANT
EUROPEAN TELECOMMUNICATIONS STANDARDS
INSTITUTE AND PLAINTIFF TRUEPOSITION, INC.
REGARDING JURISDICTIONAL DISCOVERY**

Defendant European Telecommunications Standards Institute (“ETSI”) and plaintiff TruePosition, Inc. (“TruePosition”) jointly submit the following second supplemental status report regarding jurisdictional discovery as an update to their joint May 10, 2012 original status report (Dkt. 113), and their joint June 25, 2012 first supplemental status report (Dkt. 118).

A. Completion of Document Production and Written Discovery

On July 16, 2012, ETSI completed its production of documents responsive to TruePosition’s Second Set Of Document Production Requests to ETSI Relating To Personal Jurisdiction. The full production included more than 86,000 pages of documents.

The parties have resolved all issues concerning TruePosition’s Requests for Admission,

and amended responses have been served.

B. Deposition of Adrian Scrase

The parties have agreed that the deposition of Adrian Scrase, ETSI's Vice President, International Partnership Projects, will be conducted during the week of August 20. The parties will notify the Court when the deposition has been concluded.

Dated: July 19, 2012

/s/ Colleen Healy Simpson

John G. Harkins, Jr.
Colleen Healy Simpson
Evelyn R. Protano
HARKINS CUNNINGHAM LLP
2800 One Commerce Square
2005 Market Street
Philadelphia, PA 19103-7042
(215) 851-6700

Counsel for TruePosition, Inc.

/s/ Richard S. Taffet

Richard S. Taffet, *admitted pro hac vice*
Derek Care, *admitted pro hac vice*
BINGHAM MCCUTCHEN LLP
399 Park Avenue
New York, NY 10022-4689
(212) 705-7729

William S.D. Cravens, *admitted pro hac vice*
BINGHAM MCCUTCHEN LLP
2020 K Street, N.W.
Washington, DC 20006-1806
(202) 373-6083

Stephen W. Armstrong
MONTGOMERY, MCCracken,
WALKER & RHOADS, LLP
123 South Broad St.
Philadelphia, PA 19109
(215) 772-7552

*Counsel for European Telecommunications
Standards Institute*

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2012, I served the foregoing document on all parties to this litigation by ECF.

/s/ Derek Care
Derek Care